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August 5, 2025

VIA CM/ECF

The Honorable Ronnie Abrams
United States District Judge
Southern District of New York
40 Foley Square, Room 2203
New York, New York 10007

Re: *Morrissey v. A&E Television Networks, LLC, et al.*, No. 24 Civ. 7856 (S.D.N.Y.)

Dear Judge Abrams:

We write on behalf of Plaintiff Sabrina E. Morrissey, in her capacity as court-appointed guardian to W.W.H. (the “Guardian”), pursuant to the Court’s order dated June 5, 2025 directing the parties to “file a joint letter updating the Court as to the status of the medical evaluation, and proposing next steps in this action, if necessary” by August 5, 2025. ECF 67.

The medical evaluation of W.W.H. has now been completed. After conducting a significant number of tests (both medical and neuropsychological) and scans (including brain imaging), the medical specialists have formed an opinion concerning W.W.H.’s current neurological condition and diagnosis, including whether she has the ability to make decisions about the above-referenced litigation arising out of the so-called documentary, “*Where is Wendy Williams?*,” which aired on February 24 and 25, 2024.

In the weeks since Your Honor’s issuance of the June 5 Order, however, further complications have arisen. These complications result from the fact that various parties, including counsel for certain members of W.W.H.’s family, W.W.H.’s ex-husband, and others, have indicated their intention to challenge both the Guardianship itself as well as Ms. Morrissey’s status as Guardian.¹ To that end, the Guardianship Court appointed W.W.H. with new independent counsel to address these issues on W.W.H.’s behalf. *See* Letter, *Williams-Hunter v. Morrissey, et al.*, No. 25 Civ. 5107 (S.D.N.Y. July 17, 2025), ECF 86. Although we would prefer there not to

¹ *See, e.g.*, “Wendy Williams’ Lawyer: We’re Gonna Sue People Responsible for Guardianship!!!,” TMZ (July 23, 2025), <https://www.tMZ.com/2025/07/23/wendy-williams-lawyer-vows-sue-guardianship-people-joe-tacopina/>; “Wendy Williams Says She Celebrated Her Birthday a Step Closer to Freedom – But Still Has Far To Go,” Page Six (July 23, 2025), <https://pagesix.com/2025/07/23/entertainment/wendy-williams-celebrates-a-birthday-one-step-closer-to-freedom/>; “Wendy Williams’ Ex-Husband Sues Her Guardian, the Judge Presiding Over her Case and Others for \$250 Million on Her Behalf,” People (June 18, 2025), <https://people.com/wendy-williams-ex-husband-sues-guardian-judge-250-million-implementing-guardianship-11757470>.

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be further delay, we do believe that it would be most efficient and would best preserve both the Court's and the parties' resources to refrain from proceeding with discovery in this lawsuit until the Guardianship Court has made a final determination with respect to these issues, presumably based at least in part on the results of the medical evaluations that have now been completed.²

Accordingly, because of the ongoing disputes regarding the Guardian's role and authority, we respectfully request that this Court extend the stay for the later of three months from August 5 (or November 5, 2025), or until such time as the Guardianship Court has made a determination as to the status of the Guardianship and the Guardian. We have conferred with counsel for Defendants and their position is set forth below.

Defendants' position: Defendants remain concerned by the risk of prejudice from this delay, due to W.W.H.'s purported progressive neurological disease, as alleged in Plaintiff's complaint. Therefore, Defendants would not have any objection to this proposed additional stay of the litigation *if* Plaintiff's counsel would work with Defendants to set an early deposition of W.W.H. Plaintiff does not consent to this request for an early deposition.

We appreciate Your Honor's consideration and are available to address any questions that the Court might have.

Respectfully submitted,



Roberta A. Kaplan

cc: Counsel of Record (via ECF)

² In addition, before we report the neurological experts' findings and opinion, we believe that it will be necessary for us to seek clarification from the Guardianship Court regarding the application of the Guardianship Court's prior sealing orders to our report to Your Honor.